IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION)) MDL No. 1:13-md-2419-FDS
This Document Relates To:	
Jane R. and Gerald W. Wray v. New England Compounding Pharmacy, Inc.))))

MOTION FOR ADMISSION OF ANNIKA K. MARTIN PRO HAC VICE

Plaintiffs Jane R. and Gerald W. Wray ("Plaintiffs"), pursuant to Local Rule 83.5.3, hereby move for the admission *pro hac vice* of attorney Annika K. Martin of Lieff Cabraser Heimann & Bernstein LLP as co-counsel in the above-captioned cases. In support of this Motion, Plaintiffs state the following:

- (1) The law firm of Lieff Cabraser Heimann & Bernstein LLP, 250 Hudson Street, 8th Floor, New York, New York 10013, has been retained by Plaintiffs to act as their co-counsel in the above-captioned cases.
- (2) As set forth in the affidavit attached hereto, Annika K. Martin is a member in good standing of the State Bar of New York.
- (3) There are no disciplinary proceedings pending against Attorney Martin as a member of the bar in any jurisdiction.
- (4) Annika K. Martin is co-counsel to the Plaintiffs in the above-captioned cases.
- (5) Because of Annika K. Martin's familiarity with the particular issues raised in these cases and the claims against the Plaintiffs, it is Plaintiffs' desire that she participate in its presentation in these pending and all future matters for Plaintiffs.
- (6) Annika K. Martin is familiar with the Local Rules for the District of Massachusetts.

WHEREFORE, Plaintiffs hereby move for the admission of Annika K. Martin,

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pro hac vice, to appear as co-counsel in the above-captioned cases.

Dated: June <u>8</u>, 2013

Respectfully Submitted:

Mark P. Chalos (TN Bar No. 019328)

Admitted Pro Hac Vice

LIEFF CABRASER HEIMANN

& BERNSTEIN LLP

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CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2013, I filed a copy of the foregoing by electronic means with the United States District Court for the District of Massachusetts using the CM/ECF system, which will send notification to counsel of record.

By:	/s/ Mark P. Chalos	
	Mark P. Chalos	